

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2019-393-E

In the Matter of:

Application of Dominion Energy South
 Carolina, Inc. for Approval of “Storage
 Tariff” (Technology-Neutral Avoided
 Cost Rates for Energy and Capacity for
 Dispatchable Renewable Generating
 Facilities)

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PETITION TO INTERVENE

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, the “Conservation Groups”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rule of practice and procedure. In support of its petition, Petitioners state as following:

1. The Commission established Commission Docket 2019-393-E on December 31, 2019, by way of Dominion Energy South Carolina, Inc.’s (“DESC” or “the Company”) Application filed on December 30, 2019. DESC filed its Rate PR Qualifying Facility Storage Tariff, as required by the Settlement Agreement between DESC and the South Carolina Business Alliance, Inc. (“SBA”) in Docket No. 2017-370-E. The tariff addresses avoided cost rates for energy

and capacity procured from Qualifying Facilities that either use storage as a separate resource or operate as a dispatchable renewable generating facility such as solar plus storage.

2. The Commission established an intervention deadline of March 18, 2020. This petition is timely filed.
3. Act 62 requires that the Commission “address all renewable energy issues in a fair and balanced manner, considering the costs and benefits to all customers of all programs and tariffs that relate to renewable energy and energy storage.”
4. Act 62 further requires that “each electrical utility’s avoided cost methodology fairly accounts for costs avoided by the electrical utility or incurred by the electrical utility, including, but not limited to, energy, capacity, and ancillary services provided by or consumer by small power producers including those utilizing energy storage equipment.”
5. Act 62 further states that the proceedings “shall include an opportunity for intervention, discovery, filed comments or testimony, and an evidentiary hearing.”
6. CCL is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses, and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has members from across the State, including members who received electricity

service from the Company and will be impacted by the decisions made in these proceedings regarding renewable energy, energy storage, and the recovery of avoided costs. The address of CCL's main office is 131 Spring Street, Charleston, SC 29403.

7. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe, and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the State, including members who receive electricity service from the Company and will be impact by decisions made in this proceeding regarding renewable energy, energy storage, and the recovery of avoided costs. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina.
8. The Conservation Groups have participated as intervenors in multiple prior proceedings related to the Company's procurement of renewable energy, avoided costs, and tariff offerings, including but not limited to Docket Nos. 2019-184-E, 2019-185-E, and 2019-186-E.
9. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding regarding renewable energy, energy storage, and tariff offerings, and their interests cannot be adequately addressed by any other party. The Conservation Groups seek accurate and fair valuation of costs avoided by

renewable energy and energy storage resources and the related tariffs proposed through this proceeding, and seek compliance with federal and state law requirements, including the recently passed Energy Freedom Act. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest.

10. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they will be allowed to intervene as a party of record, and to participate fully in this proceeding.

Respectfully submitted this 18th day of March, 2020.

s/ J. Blanding Holman, IV

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